REMARKS

Claims 11-20 are pending in the present application. Claims 11-20 stand rejected. The Applicant respectfully requests reconsideration of the rejections in light of the following comments.

Those were anticipated by Claims 11-13, 19, and 20 were rejected under 35 U.S.C. §102(e) as being anticipated by Mehrotra (U.S. Patent No. 6,115,717). The Applicant respectfully traverses this rejection for the following reasons.

With respect to claim 11, the Office Action asserts that Mehrotra, among other things, discloses the claimed feature of "storing said features together with said image sequence wherein separate search features sets are provided for each individual object." However, as recognized in the present Office Action, column 3, lines 24-26 of Mehrotra teach that open space contained in the image is stored as metadata. Open space, however, is clearly recognized by those of ordinary skill in the art as being different than "individual object" as featured in the present claim. Additionally, the claimed "feature sets" for individual objects are not equivalent to metadata as disclosed by Mehrotra.

With respect to the claimed feature sets of individual objects, as argued above, open space metadata of images is different from this claimed feature. In particular, the detection and describing of open spaces is less complex and different from detecting and describing individual objects. Open space is characterized where the color of image pixels in a relatively large area does not change significantly (e.g., RGB values are very similar). The detection of these open spaces as taught by Mehrotra is merely the detection of a border adjacent to an open space, which is quite different from detecting individual objects. Individual objects, for example, can be things such as humans, animals, cars, houses, etc. and are much more difficult to detect and describe versus open spaces.

Further, with respect to the apparent confusion evinced in the present Office Action concerning feature sets versus metadata, Mehrotra specifically teaches in column 5, lines 8-9 that the open space metadata includes quantified open space region depictive properties. Thus, the metadata merely defines region properties, not specific data characterizing and distinguishing certain objects. As further disclosed in column 5, lines 10-17 of Mehrotra, detected open space is preferably quantified by a set of four depictive properties: open space extent, open space

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openness, and two color properties. This is not tantamount to the claimed "feature sets"... for each individual object." To further clarify this distinction, an example of the use of feature sets is the enablement to search a particular individual object such as a dog that appears in a movie, in order to find films with dogs. In contrast, the teaching of Mehrotra does not disclose or suggest enabling searching of kinds of objects. Rather, the teachings of Mehrotra are merely concerned with searching open space in order to find a space for inserting objects such as text, captions, or figurative elements (see column 1, line 23). Thus, Mehrotra does not teach or suggest feature sets for individual objects for the ability to search kinds of objects using such feature sets. Accordingly, the Applicant respectfully submits that Mehrotra does not teach or suggest all of the elements of claim 11 and requests that the rejection be withdrawn.

With respect to dependent claims 12, 13, 19, and 20, these claims are believed to be allowable at least for the reasons presented above with respect to claim 11.

Claims 14-18 were rejected under 35 U.S.C. §103(a) as being unpatenable over Mehrotra in view of Swanson et al. (U.S. Patent No. 5,987,459). The Applicants respectfully traverses this rejection, submitting that these claims are allowable at least for the same reasons presented above with respect to independent claim 11.

In light of the foregoing comments, the Applicant respectfully submits that the pending claims are allowable over the prior art of record and requests that a timely Notice of Allowance be issued in this case.

Respectfully submitted,

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